MILLER, CANFIELD, PADDOCK AND STONE, P.L.C. 150 West Jefferson Ave., Suite 2500 Detroit, MI 48226 Timothy A. Fusco Marc N. Swanson (313) 496-8435

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

	X	
	:	
In re:	:	Chapter 11
	:	
General Motors Corporation,	:	Case No. 09-50026 (REG)
	:	
Debtor.	:	
	X	

COUNTY OF WAYNE, MICHIGAN'S EVIDENCE LIST FOR THE HEARING TO CONSIDER DEBTORS' MOTION PURSUANT TO 11 U.S.C. §§ 105, 363(b), (f), (k), (m) AND 365, AND FED. R. BANKR. P. 2002, 6004 AND 6006, TO APPROVE (A) THE SALE PURSUANT TO THE MASTER SALE AND PURCHASE AGREEMENT WITH VEHICLE ACQUISITION HOLDINGS LLC, A U.S. TREASURY-SPONSORED PURCHASER, FREE AND CLEAR OF LIENS, CLAIMS, ENCUMBRANCES AND OTHER INTERESTS; (B) THE ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS AND UNEXPIRED LEASES; AND (C) OTHER RELIEF

# TO THE HONORABLE ROBERT E. GERBER UNITED STATES BANKRUPTCY JUDGE

The County of Wayne, Michigan ("Wayne County") hereby identifies the following physical or documentary evidence<sup>1</sup> which Wayne County may present at the June 30, 2009 hearing on the Debtors' Asset Sale Motion (Docket No. 92) ("Motion"), in support of Wayne County's filed Objection (Doc. No. 1889) to the Motion:

EXHIBIT	TITLE
A	Letter from Dane Tatmore to Willow Run
	Plant employees, dated June 1, 2009

<sup>&</sup>lt;sup>1</sup> Wayne County reserves its right to amend or supplement this list should the need present itself.

В	Declaration of Don Skidmore, dated June 18,
	2009
С	Declaration of Ken Figley, dated June 18, 2009
D	Ypsilanti Resolution 2009-19, dated June 16,
	2009
Е	Declaration of Steve Theordore, dated June 18,
	2009
F	Declaration of Ypsilanti Township Supervisor,
	Brenda L. Stumbo, dated June 18, 2009
G	Global BIQ Level Survey
Н	PPM Performance Data
I	FTQ Performance Data
J	Letter to Fritz Henderson from Jennifer M.
	Granholm and John G. Cherry, Jr., dated June
	18, 2009
K	Letter to Fritz Henderson from John D.
	Dingell, dated June 1, 2009
L	Letter to John D. Dingell from Gary L.
	Cowger, dated June 5, 2009

Dated: June 25, 2009

Respectfully submitted,

MILLER, CANFIELD, PADDOCK AND STONE, PLC

By: /s/ Timothy A. Fusco

Timothy A. Fusco (P13768) Marc N. Swanson (P71149) Attorneys for County of Wayne, Michigan 150 West Jefferson, Suite 2500 Detroit, MI 48226

Phone: (313) 496-8435 Fax: (313) 496-8452 fusco@millercanfield.com swansonm@millercanfield.com

and

Edward Thomas (P21371) Wayne County Corporation Counsel 600 Randolph Detroit, MI 48226 Phone: (313) 224-0055

### **CERTIFICATE OF SERVICE**

Timothy A. Fusco hereby certifies that, on the 25th day of June, 2009, he served a copy of the foregoing document, *COUNTY OF WAYNE*, *MICHIGAN'S EVIDENCE LIST FOR THE HEARING TO CONSIDER DEBTORS' MOTION PURSUANT TO 11 U.S.C. §§ 105, 363(B), (F), (K), (M) AND 365, AND FED. R. BANKR. P. 2002, 6004 AND 6006, TO APPROVE (A) THE SALE PURSUANT TO THE MASTER SALE AND PURCHASE AGREEMENT WITH VEHICLE ACQUISITION HOLDINGS LLC, A U.S. TREASURY-SPONSORED PURCHASER, FREE AND CLEAR OF LIENS, CLAIMS, ENCUMBRANCES AND OTHER INTERESTS; (B) THE ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS AND UNEXPIRED LEASES; AND (C) OTHER RELIEF ("List") upon each of the persons listed on the attached Exhibit A, by Federal Express Priority Overnight Delivery.* 

The List was also served via electronic mail upon the Debtors' Counsel addressed to:

harvey.miller@weil.com joseph.smolinsky@weil.com stephen.karotkin@weil.com The exhibits described on the List were attached to the County of Wayne, Michigan's Objection which was filed as docket number 1889 in this matter.

Dated: June 25, 2009 By: <u>/s/ Timothy A. Fusco</u>

Timothy A. Fusco (P13768) 150 West Jefferson, Suite 2500

Detroit, MI 48226 Phone: (313) 496-8435 Fax: (313) 496-8452

fusco@millercanfield.com

#### **EXHIBIT A**

### FEDERAL EXPRESS SERVICE LIST

The Honorable Robert E. Gerber Chambers United States Bankruptcy Court One Bowling Green New York, NY 10004-1408

Weil, Gotshal & Manges LLP Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., Joseph H. Smolinsky, Esq. 767 Fifth Avenue New York, NY 10153

Cadwalader, Wickersham & Taft LLP Attn: John J. Rapisardi, Esq. One World Financial Center New York, NY 10281

Cleary Gottlieb Steen & Hamilton LLP Attn: James L. Bromley, Esq. One Liberty Plaza New York, NY 10006

Cohen, Weiss and Simon LLP Attn: Babette Ceccotti, Esq. 330 W. 42<sup>nd</sup> Street New York, NY 10036

Vedder Price, P.C. Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq. 1633 Broadway, 47<sup>th</sup> Floor New York, NY 10019

Office of the United States Trustee for the Southern District of New York Attn: Diana G. Adams, Esq. 33 Whitehall St., 21<sup>st</sup> Floor New York, NY 10004

Kramer Levin Naftalis & Frankel, LLP Attn: Thomas Moers Mayer, Kenneth H. Eckstein, Gordon Z. Novod 1177 Avenue of the Americas New York, NY 10036